

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MONIQUE DA SILVA MOORE,)	
MARYELLEN O'DONOHUE,)	
LAURIE MAYERS, HEATHER)	
PIERCE, and KATHERINE)	
WILKINSON on behalf of themselves)	Civ No. 11-CV-1279 (RJS) (AJP)
and all others similarly situated,)	
)	
PLAINTIFFS,)	
)	
v.)	
)	
PUBLICIS GROUPE SA and)	
MSLGROUP,)	
)	
DEFENDANTS.)	
)	

**DECLARATION OF SIHAM NURHUSSEIN IN SUPPORT OF PLAINTIFFS' RULE
72(a) OBJECTION TO MAGISTRATE JUDGE PECK'S
JANUARY 4, 2012 DISCOVERY RULINGS**

SIHAM NURHUSSEIN, an attorney duly admitted to practice law in the State of New York, in the Southern District of New York, states as follows:

1. My firm represents the Plaintiffs in the above-referenced action.
2. Annexed to this declaration as "Exhibit A" is a true and correct copy of Plaintiffs' Request for Pre-Motion Conference Regarding Plaintiffs' Proposed Motion to Compel Discovery, dated December 27, 2011.
3. Annexed to this declaration as "Exhibit B" is a true and correct copy of Plaintiffs' Request for Pre-Motion Conference Regarding Plaintiffs' Proposed Motion for Sanctions, dated December 29, 2011.
4. Annexed to this declaration as "Exhibit C" is a true and correct copy of the transcript of the January 4, 2012 conferences before Judge Peck.

5. Annexed to this declaration as “Exhibit D” is a true and correct copy of an organizational chart produced by Defendant MSLGroup, Bates Stamp MSL000821.

I DECLARE UNDER THE PENALTIES OF PERJURY THAT THE FOREGOING IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Dated: January 18, 2012

New York, New York

/s/ Siham Nurhussein

Siham Nurhussein